

Information to identify the case:

Debtor 1 Angela Delores Williams

Debtor 2 _____

United States Bankruptcy Court for the Eastern District of Pennsylvania

Case Number 22-12177-mdc Chapter 13

Check if this is an amended filing

Debtor's Motion to Modify Confirmed Chapter 13 Plan

The Debtor in this case wishes to modify their confirmed chapter 13 plan. If this is a joint case, the word Debtor means both debtors.

Part 1: Information About the Debtor's Case and Current Plan

1. Date case filed: August 19, 2022

2. Date plan last approved: January 6, 2023 Original Modified

Part 2: Information About the Proposed Plan

3. ECF No. of proposed plan: 32

4. Purpose:
(check all that apply)

Cure delinquency Cure infeasibility
 Recently filed/amended claim Payment of attorney fees
 Other Surrender vehicle

Part 3: Legal Argument

5. Changing circumstances:
(the facts)

Upon information and belief, the Debtor's financial circumstances have changed since the current plan was approved, as follows:

The vehicle being paid for through the current plan is not running well and needs to be replaced. The Debtor has filed a supplemental Schedule J showing monthly disposable income sufficient to pay the monthly plan payments required by the proposed plan.

6. Grounds for relief:
(the law)

As a matter of law, the Court must modify the Debtor's plan as proposed pursuant to 11 U.S.C §1329, L.B.R. 3015-5, and for the following reasons:

The Debtor's changing financial circumstances are evidence that the Debtor can make the payments necessary under the proposed plan.

Part 4: Motion

The Debtor moves the Court to grant relief in the form of order attached, and further in their favor if necessary and proper under the law.



Signature of Attorney for Debtor

Michael I. Assad (#330937)

Printed Name and Attorney ID

1500 Walnut Street, Suite 900

Number Street

Philadelphia, PA 19102

City, State, Zip

January 25, 2024

Date

Cibik Law, P.C.

Firm Name

215-735-1060

Phone

mail@cibiklaw.com

Email